Mr. Andrew Frisbie
Wabash National Corporation
P.O. Box 6129
Lafayette, IN 47905

Re: 157-11744
First Significant Permit Modification to
Part 70 No.: T 157-6070-00046

Dear Mr. Frisbie:

Wabash National was issued a permit on June 25, 1999, for a stationary truck trailer assembly plant. A letter requesting changes to this permit was received on January 5, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document and as follows (bold emphasis added to new language):

1. The table of contents entry for Section D.1 on Page 3 of the permit has been revised as follows to account for the removal of paint booths PB16 and PB18:

2. Item (1) of Section A.2 starting on Page 5 of the permit has been revised to account for the removal of paint booths PB16 and PB18 as follows:

A.2(1) ~~Eighteen (18)~~ **Sixteen (16)** surface coating operations, identified as:

(a) PB1, with a maximum capacity of 4.15 metal couplers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB1S,

(b) PB2, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB2S,

(c) PB3, with a maximum capacity of 1.83 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB3S,

(d) PB4, with a maximum capacity of 1.83 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB4S,

(e) PB5, with a maximum capacity of 0.375 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB5S,

(f) PB7, with a maximum capacity of 4.15 metal couplers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB7S,

(g) PB8, with a maximum capacity of 554.2 metal crossmembers per hour, using dip coating, and a 2.07 MMBtu/hr natural gas regenerative thermal oxidizer, RTOX, for control, and exhausting to stack PB8S,

(h) PB9, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB9S,

(i) PB10, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB10S,

(j) PB11, with a maximum capacity of 0.25 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB11S,

(k) PB12, with a maximum capacity of 0.67 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB12S,

(l) PB13, with a maximum capacity of 1.46 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB13S,

(m) PB14, with a maximum capacity of 7.25 metal axles per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB14S,

(n) PB15, with a maximum capacity of 1.46 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB15S,

(o) ~~PB16, with a maximum capacity of 1.04 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB16S,~~

~~(p)~~ PB17, with a maximum capacity of 0.21 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB17S,

~~(q) PB18, with a maximum capacity of 1.04 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB18S,~~

~~(r)~~ **(p)** RC, with a maximum capacity of 5.66 metal trailer interiors per hour, using rollcoating application method, and no control, and exhausting to stack RCS,

3. The facilities descriptions at the beginning of Section D.1 (Pages 29 and 30) have been revised

consistent with the changes to Section A.2, Item (1), outlined in No. 2, above.

4. Condition D.1.1 on Page 30 of the permit has been revised to account for the removal of paint booths PB16 and PB18 as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9 (Miscellaneous Metal Coating)]
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths, PB1 - PB5, PB7, PB9 - ~~PB18~~ **PB15, PB17**, and the roll coating line, RC, and at the dip line, PB8, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

5. Item (b)(1) of Condition D.1.2 starting on Page 30 of the permit has been revised to account for the removal of paint booths PB16 and PB18 and correct a typographical error as follows:

D.1.2(b) Pursuant to OP 4100-0046-0464, issued on October 9, 1990,
(1) the total amount of organic solvents delivered to the spray painting operations, PB10 - ~~PB18~~ **PB15 and PB17**, including solvents from coatings, thinners and cleaning solvents, ~~PB10 - PB18, including solvents from coatings, thinners and cleaning solvents,~~ shall be limited to 249.6 tons per consecutive 12 month period.

Note: Page 31 of the permit has been reformatted based on the changes to Condition D.1.2.

6. Item (a) of Condition D.1.8 on Page 32 of the permit has been revised to account for the removal of paint booths PB16 and PB18 as follows:

D.1.8 Pollution Control Equipment
(a) Pursuant to both CP 157-4162, Plt ID 157-00046, issued on June 23, 1995, and OP 4100-0046-0464, issued on October 9, 1990, the dry filters for PM control shall be in operation at all times when the ~~sixteen (16)~~ **fourteen (14)** paint booths (PB1 - PB5, PB7, PB9 - ~~PB18~~ **PB15 and PB17**) are in operation.

7. The quarterly report form included as Page 46 of the permit has been changed consistent with the revisions to the limiting condition D.1.2(b)(1) outlined in No. 5, above.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (2-8325), or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
JKJ
cc: File - Tippecanoe County
U.S. EPA, Region V
Tippecanoe County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Wabash National Corporation
1000 Sagamore Parkway South
Lafayette, Indiana 47903

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T157-6070-00046	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 25, 1999

First Significant Permit Modification: 157-11744	Pages Affected: 3, 5, 6, 29, 30, 31, 32 and 46
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary truck trailer assembly plant.

Responsible Official:	Mr. Will Lewallen
Source Address:	1000 Sagamore Parkway South, Lafayette, IN 47905
Mailing Address:	P.O. Box 6129, Lafayette, IN 47903
SIC Code:	3715
County Location:	Tippecanoe
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

The source consists of the following permitted emission units and pollution control devices:

(1) Sixteen (16) surface coating operations, identified as:

(a) PB1, with a maximum capacity of 4.15 metal couplers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB1S,

(b) PB2, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB2S,

(c) PB3, with a maximum capacity of 1.83 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB3S,

(d) PB4, with a maximum capacity of 1.83 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB4S,

(e) PB5, with a maximum capacity of 0.375 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB5S,

(f) PB7, with a maximum capacity of 4.15 metal couplers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB7S,

(g) PB8, with a maximum capacity of 554.2 metal crossmembers per hour, using dip coating, and a 2.07 MMBtu/hr natural gas regenerative thermal oxidizer, RTOX, for control, and exhausting to stack PB8S,

(h) PB9, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB9S,

(i) PB10, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB10S,

(j) PB11, with a maximum capacity of 0.25 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB11S,

(k) PB12, with a maximum capacity of 0.67 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB12S,

(l) PB13, with a maximum capacity of 1.46 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB13S,

(m) PB14, with a maximum capacity of 7.25 metal axles per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB14S,

(n) PB15, with a maximum capacity of 1.46 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB15S,

(o) PB17, with a maximum capacity of 0.21 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB17S,

(p) RC, with a maximum capacity of 5.66 metal trailer interiors per hour, using rollcoating application method, and no control, and exhausting to stack RCS,

(2) Three (1) shot blasters, identified as:

(a) BB1, with a maximum capacity of 3.7 tons of steel shot per hour, using a baghouse, identified as BH1as control, and exhausting to stack BH1S,

(b) BB2, with a maximum capacity of 1.26 tons of steel shot per hour, using a baghouse, identified as BH2as control, and exhausting to stack BH2S,

(c) BB3, with a maximum capacity of 1.26 tons of steel shot per hour, using a

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Sixteen (16) surface coating operations, identified as:

(a) PB1, with a maximum capacity of 4.15 metal couplers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB1S,

(b) PB2, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB2S,

(c) PB3, with a maximum capacity of 1.83 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB3S,

(d) PB4, with a maximum capacity of 1.83 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB4S,

(e) PB5, with a maximum capacity of 0.375 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB5S,

(f) PB7, with a maximum capacity of 4.15 metal couplers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB7S,

(g) PB8, with a maximum capacity of 554.2 metal crossmembers per hour, using dip coating, and a 2.07 MMBtu/hr natural gas regenerative thermal oxidizer, RTOX, for control, and exhausting to stack PB8S,

(h) PB9, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB9S,

(i) PB10, with a maximum capacity of 2.42 metal bogies per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB10S,

(j) PB11, with a maximum capacity of 0.25 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB11S,

(k) PB12, with a maximum capacity of 0.67 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB12S,

(l) PB13, with a maximum capacity of 1.46 metal trailers per hour, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB13S,

Facility Description [326 IAC 2-7-5(15)]

cont. Sixteen (16) surface coating operations, identified as:

(m) PB14, with a maximum capacity of 7.25 metal axles per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB14S,

(n) PB15, with a maximum capacity of 1.46 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB15S,

(o) PB17, with a maximum capacity of 0.21 metal trailers per hour, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB17S,

(p) RC, with a maximum capacity of 5.66 metal trailer interiors per hour, using rollcoating application method, and no control, and exhausting to stack RCS.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9 (Miscellaneous Metal Coating)]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths, PB1 - PB5, PB7, PB9 - PB15, PB17, and the roll coating line, RC, and at the dip line, PB8, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to CP-157-4162, Plant ID 157-00046, issued on June 23, 1995,

(1) the total amount of VOC delivered to the applicator of spray operations PB1 - PB5, PB7, and PB9, shall not exceed 257.9 tons per 365 day period rolled on a daily basis.

(2) The input of VOC to the crossmember dip line, PB8, and the usage of cleanup solvent shall be limited to 595.1 tons per 365 day period rolled on a daily basis. This limitation will prevent the VOC emissions from the crossmember dip line from being greater than 29.78 tons per year. This limitation is based upon the use of a control device on the crossmember dip line with an overall control efficiency of 95%.

(3) Any change or modification which may increase potential to emit of VOC to 290 tons per year from the equipment listed in (a)(1) and (2) of this condition shall obtain a PSD permit.

(b) Pursuant to OP 4100-0046-0464, issued on October 9, 1990,

(1) the total amount of organic solvents delivered to the spray painting operations, PB10 - PB15 and PB17, including solvents from coatings, thinners and cleaning solvents, shall be limited to 249.6 tons per consecutive 12 month period.

(2) Any change or modification which may increase potential to emit VOC of 250 tons per year from the equipment listed in (b)(1) of this condition shall obtain a PSD permit.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP 157-4162, issued on June 23, 1995, the particulate matter from the surface coating operations, PB1 - PB5, PB7, and PB9, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the spray coating is in operation, in order to comply with this limit.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC capture and destruction efficiency testing of the thermal oxidizer, RTOX, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one-half (2 ½) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

(a) Compliance with Condition D.1.2(a)(1) and (a)(2) shall be demonstrated at the end of each day based on the total volatile organic compound usage for the most recent 365 day period.

(b) Compliance with Condition D.1.2(b) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Pollution Control Equipment

(a) Pursuant to both CP 157-4162, Plt ID 157-00046, issued on June 23, 1995, and OP 4100-0046-0464, issued on October 9, 1990, the dry filters for PM control shall be in operation at all times when the fourteen (14) paint booths (PB1 - PB5, PB7, PB9 - PB15 and PB17) are in operation.

(b) Pursuant to CP 157-4162, Plt ID 157-00046, issued on June 23, 1995, the regenerative thermal oxidizer, RTOX, for VOC control shall be in operation at all times when the dip line, PB8, is in operation.

D.1.9 Monitoring

The compliance monitoring requirements applicable to this equipment are as follows:

The spray coating operations have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) The particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not
(1) visibly detectable at the exhaust,

(2) accumulated on the rooftops or on the ground.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

The dip line, PB8, VOC emissions are controlled by the regenerative thermal oxidizer, RTOX, and has applicable compliance monitoring conditions as specified below:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the capture system for measuring air flow rate when ever the crossmember dip line is operated and cleaned. The output of this system shall be recorded, and that air flow rate shall be that which demonstrates compliance with 100 % capture.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Wabash National Corporation
Source Address: 1000 Sagamore Parkway South, Lafayette, IN 47903
Mailing Address: P.O. Box 6129, Lafayette, IN 47903
Part 70 Permit No.: T157-6070-00046
Facility: PB10 - PB15 and PB17
Parameter: VOC
Limit: 249.6 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Wabash National Corporation**
Source Location:	**1000 Sagamore Parkway South, Lafayette, IN 47903**
County:	**Tippecanoe**
SIC Code:	**3715**
Operation Permit No.:	**T157-6070-00046**
Operation Permit Issuance Date:	**June 25, 1999**
Permit Modification No.:	**157-11744-00046**
Permit Reviewer:	**Janusz Johnson**

The Office of Air Management (OAM) has reviewed a modification application from Wabash National Corporation relating to the removal of paint booths PB16 and PB18 from the source.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 5, 2000.

Limited Potential to Emit

There will be no change in the Limited PTE of the source as a result of the removal of the two (2) paint booths (PB16 and PB18). These booths were previously included under an input VOC usage limitation of 249.6 tons per year originally established in OP 4100-0046–464 issued on October 9, 1990, and carried over into the Part 70 Operating permit. The booths will be removed from the limiting condition, but the limited level of emissions from the remaining booths not change; therefore, there will be no change in the PTE of the source.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(D) and 326 IAC 2-7-12(d)(1) because the removal of the paint booths changes a Part 70 permit term or condition (Condition D.1.2) for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement (326 IAC 2-2 (Prevention of Significant Deterioration)) to which the source would otherwise be subject.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability

There will be no changes to State rule requirements as a result of removing the two (2) paint booths (PB16 and PB18).

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The removed paint booths (PB16 and PB18) will no longer have applicable compliance monitoring requirements.

Conclusion

The removal of the paint booths (PB16 and PB18) from the permit shall be subject to the conditions of the attached proposed **Significant Permit Modification No. 157-11744-00046**.